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11 STATE OF ISRAEL

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 EITAN O. ELIAHU,
16 Plaintiff,
17 vs.
18 STATE OF ISRAEL,
19 Defendant.

20 Case No.: 5:14-CV-01636-BLF

21 **STIPULATION AND [PROPOSED]
22 ORDER TO CONTINUE CASE
23 MANAGEMENT CONFERENCE**

STIPULATION

WHEREAS, pursuant to this Court's April 10, 2014 Order and the Clerk's Notice Setting Case Management Conference Following Reassignment, the deadline for the parties to complete their Rule 26(f) conference is set for July 24, 2014; the deadline for initial disclosures is set for August 7, 2014; and the initial Case Management Conference for this case is set for August 14, 2014;

WHEREAS, as of July 14, 2014, Defendant State of Israel had not yet been served with Plaintiff Eitan O. Eliahu's Complaint in this case pursuant to the applicable requirements of Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (Nov. 15, 1965);

WHEREAS, upon proper service, Defendant State of Israel, as a foreign sovereign entity, is entitled to a period of sixty days to file a responsive pleading pursuant to 28 U.S.C. § 1608(d);

WHEREAS, Defendant State of Israel intends to bring a motion to dismiss the Complaint by or before the sixty-day deadline; and

WHEREAS the parties believe that the Court and party resources would be conserved by deferring the initial Case Management Conference and the deadlines set forth in the April 10, 2014 Order and the May 12, 2014 Clerk's Notice by a period of approximately 120 days,

IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, that the initial Case Management Conference is continued to _____ at 1:30 p.m., in Courtroom 5, 4th Floor, San Jose Courthouse. The other deadlines set forth in the Court's April 10, 2014 Order and the May 12, 2014 Clerk's Notice are continued accordingly.

Dated: July 14, 2014

ARNOLD & PORTER LLP
DANIEL B. ASIMOW
ERICA M. CONNOLLY

By: /s/ Erica Connolly
ERICA CONNOLLY
Attorney for Defendant
STATE OF ISRAEL

1 Dated: July 14, 2014

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LAW OFFICES OF KENT EASTER
KENT W. EASTER

By: /s/ Kent W. Easter
KENT W. EASTER
Attorney for Plaintiff
EITAN O. ELIAHU

ATTESTATION

Pursuant to Local Rule 5-1, I, Erica M. Connolly, attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

/s/ Erica Connolly
ERICA CONNOLLY

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The Initial Case Management Conference is continued to December 11, 2014 at 1:30 p.m. in Courtroom 3, 5th Floor, San Jose. All other attendant deadlines are continued accordingly.

IT IS SO ORDERED.

Dated: July 23, 2014


HONORABLE BETH LABSON FREEMAN
U.S. DISTRICT COURT JUDGE